

1 Q Do you see your mom talking about the application  
2 for a license was the idea of Ron and Pat and strictly for  
3 their benefit. Do you see that? It's the last sentence of  
4 the first paragraph.

5 A Yes. I see it.

6 Q Isn't it your understanding that's the same  
7 rationale behind the application that you signed?

8 A Yes.

9 Q However, it's clear, isn't it, that their  
10 description in this letter is relating to one of the June  
11 1996 licenses, isn't it?

12 A I have no idea what they intended in this letter.  
13 I didn't write it or read it.

14 Q So all you can tell us is that Ron and Pat have  
15 had a discussion with family members, you and your mom,  
16 where they've asked for them to participate in the FCC  
17 application process and it was your uncle and aunt's idea  
18 and for their benefit. Do you understand --

19 MS. LANCASTER: Objection, Your Honor. Compound.  
20 I'm not sure I even got it.

21 THE COURT: First, you should let Mr. Pedigo  
22 finish his question, then raise the objection, and I'll ask  
23 Mr. Pedigo to restate it and perhaps break it down.

24 BY MR. PEDIGO:

25 Q Do you see, Ms. Sumpter, where that same rationale

1 for submitting an FCC application existed with regard to the  
2 application you remember and the application your mom is  
3 discussing. You see that correlation, don't you?

4 MS. LANCASTER: Objection. Asked and answered.  
5 He's asked that three times.

6 THE COURT: But he's only gotten one answer, and  
7 we need two.

8 BY MR. PEDIGO:

9 Q Do you see the correlation between those  
10 rationales, Ms. Sumpter?

11 A Yes.

12 Q Was it your understanding that your mom is talking  
13 about a license granted on a different date, or do you even  
14 understand that?

15 A I didn't say I understand that. I can't tell you  
16 what my mother was thinking.

17 Q I'm sorry?

18 A I can't tell you what my mother was thinking when  
19 they wrote this.

20 Q Do you remember in December of 1997 if there were  
21 any other licenses that your mom was communicating to your  
22 Uncle Ron and Aunt Pat about?

23 A I'm not aware of any.

24 Q So is it fair to conclude that this is the same  
25 application that was submitted in June of 1996 in your mom's

1 name?

2 MR. McVEIGH: Objection, asking the witness to  
3 speculate.

4 THE COURT: Sustained.

5 BY MR. PEDIGO:

6 Q With regard to what you recall about the  
7 application you were involved with, you recall the presence  
8 of your mother and your Aunt Pat, is that correct?

9 A In the early '90s? Yes.

10 Q Excuse me. Did you understand my question?

11 MS. LANCASTER: Your Honor, I believe she was just  
12 trying to clarify the question.

13 BY MR. PEDIGO:

14 Q Ms. Sumpter, if I could ask you to listen  
15 carefully to my questions.

16 I want to ask you a series of questions about what  
17 you recall on your application, okay? Can you answer out  
18 loud please?

19 A Yes.

20 THE COURT: The question is, I understood Ms.  
21 Sumpter to be asking you whether these questions referred to  
22 the early 1990s application and I think it's fair to preface  
23 your questions with the time period to which you're  
24 referring.

25 MR. PEDIGO: Your Honor, with all due respect, we

1 don't -- That's what we're trying to clarify with our  
2 questions.

3 THE COURT: Okay. So you answer to the best of  
4 your ability.

5 BY MR. PEDIGO:

6 Q Ms. Sumpter, what I'm asking about is the  
7 application you recall signing and submitting. Is that  
8 clear?

9 THE COURT: Regardless of when you think it was.

10 MR. PEDIGO: Yes, Your Honor.

11 BY MR. PEDIGO:

12 Q Do you understand what I'm asking you about?

13 A Yes.

14 Q I want to see what details you recall.

15 You do recall your member Norma and your Aunt Pat  
16 being present when you signed the application, is that  
17 correct?

18 A That's correct.

19 Q And you recall being in the Dallas/Fort Worth  
20 area. Is that correct?

21 A That's correct.

22 Q I'm sorry, can you please speak up?

23 A That's correct.

24 Q And you do recall being in a kitchen, is that  
25 correct?

1 A I recall being --

2 Q Excuse me, do you recall being in a kitchen? Yes  
3 or no.

4 A Yes.

5 Q Thanks.

6 MS. LANCASTER: Your Honor, I would ask for  
7 instruction. The witness is entitled to explain her answer.

8 THE COURT: No, the witness is entitled to answer  
9 the precise question asked.

10 MS. LANCASTER: Then she has a right to explain it  
11 if she feels --

12 THE COURT: Not if Mr. Pedigo doesn't want an  
13 explanation.

14 You just limit your answer to the precise  
15 question. For these questions it's important.

16 BY MR. PEDIGO:

17 Q And you do recall then that your aunt and your  
18 mother, you signed an FCC application in the Dallas/Fort  
19 Worth area while you were in a kitchen. Do you recall that?

20 A Yes.

21 Q Do you recall that the explanation you received as  
22 to why you should sign that application was that it was to  
23 receive a license that would be for the benefit of Ron and  
24 Pat, do you remember that?

25 A Yes.

1 Q In the context of the conversation do you recall  
2 that the idea to get that license was an idea that had come  
3 from Ron and Pat, do you remember that?

4 A Yes.

5 Q And is it also clear that at some point -- strike  
6 that.

7 Do you recall receiving FCC correspondence on  
8 behalf of the, or as a consequence of the June 1996  
9 application being submitted? Is that correct?

10 A No, I do not.

11 Q Let me back up. You don't remember signing or the  
12 involvement with submitting that application, but you do  
13 recall correspondence from the FCC to you at 4008 Harbinger  
14 after the June 1996, is that correct?

15 A That 800 form I recall.

16 Q You remember that document.

17 A Uh huh.

18 THE COURT: That was a yes?

19 THE WITNESS: Yes.

20 BY MR. PEDIGO:

21 Q You also remember receiving, for example, the Net  
22 Wave petition at that same address.

23 A Yes.

24 Q And I believe there was a March 1998 letter that  
25 was received by you at that address, correct?

1 A Yes.

2 Q Out of all the FCC correspondence or this Net Wave  
3 petition, you don't recall that starting in the early '90s.  
4 In fact isn't it true it did not start until after June of  
5 1996?

6 THE COURT: That's a compound question.

7 Do you remember any of this occurring in the early  
8 '90s, and then the next --

9 BY MR. PEDIGO:

10 Q Would you agree that all the correspondence that  
11 you recall relating to an FCC license began after June of  
12 1996? Is that correct?

13 A That's correct.

14 Q And it's further true that you don't remember  
15 receiving any correspondence after the application you  
16 testified about as taking place in the early 1990s?

17 MR. McVEIGH: I'm going to object to that as  
18 vague. I don't understand what application taking place  
19 means, and I don't think the witness does either.

20 THE COURT: Rephrase, please.

21 BY MR. PEDIGO:

22 Q The application you testified about, the one you  
23 remember -- Do you understand what I'm asking about?

24 A Yes.

25 Q After your testimony of when that was submitted --

1 MR. McVEIGH: Objection. There's nothing in the  
2 record about that application having been submitted.

3 THE COURT: After it was signed.

4 BY MR. PEDIGO:

5 Q After you signed that application, it's true you  
6 received no FCC-related correspondence. Correct?

7 A Correct.

8 Q Your testimony was that that application was  
9 prepared to get a license to benefit Ron and Pat, correct?

10 MS. LANCASTER: Your Honor, asked and answered.  
11 This is at least the fifth time that question's been asked.

12 MR. PEDIGO: Your Honor, I'm going with a  
13 different point on this.

14 MS. LANCASTER: But it's the same question.

15 THE COURT: It might be preliminary, to basically  
16 put us in the right context.

17 BY MR. PEDIGO:

18 Q Ms. Sumpter, let me ask you this question again.  
19 You do recall for you an application being  
20 submitted --

21 MR. McVEIGH: Objection.

22 MR. PEDIGO: -- in the --

23 THE COURT: Signed, not submitted.

24 MR. PEDIGO: Signed.

25 BY MR. PEDIGO:

1 Q In the early 1990s, and that was, according to  
2 you, for the benefit of Ron and Pat, is that correct?

3 A Yes.

4 Q My question to you is, after you signed that  
5 document you don't recall receiving any documents at any  
6 time, do you?

7 MS. LANCASTER: Objection, Your Honor. First of  
8 all that's vague -- any documents at any time could mean  
9 anything that she could have ever received. And secondly,  
10 he's already asked her at least twice previously if she  
11 received any documents from the FCC, FCC-related documents  
12 subsequent to signing the application in the early '90s.

13 THE COURT: This is other documents.

14 MS. LANCASTER: Other documents any time, any  
15 place, from anyone?

16 THE COURT: Why not?

17 BY MR. PEDIGO:

18 Q Ms. Sumpter, to help you out, after you remember  
19 signing that application, you don't recall receiving any FCC  
20 correspondence between the period when you recall signing  
21 that application and June 1996, is that true?

22 A That's true.

23 Q I think you told us earlier that the plan was that  
24 that application would be signed by you, then it would be up  
25 to someone else to submit it. Was that your testimony?

1 A Yes. I gave it back to my aunt.

2 Q Is it your position that because you received no  
3 correspondence, that that application was not submitted? Is  
4 that your testimony?

5 A I guess.

6 Q Well it's your testimony. I'm just trying to ask  
7 you. Is that the deduction you've made?

8 A That it wasn't submitted because I never got any  
9 correspondence?

10 Q That's correct.

11 A I guess.

12 THE COURT: Is that a yes?

13 THE WITNESS: Yes.

14 BY MR. PEDIGO:

15 Q If Ron and Pat filled out the application and  
16 asked you to sign it, did they tell you there would be a set  
17 of circumstances where they wouldn't submit that  
18 application?

19 A No.

20 Q Do you understand what I'm asking you on that?

21 A Yeah, if there would be any circumstances why they  
22 wouldn't submit it.

23 Q Can you think of any plausible reason they would  
24 go to the trouble to get your signature and then not submit  
25 that document?

1 MR. McVEIGH: Objection. Asking the witness to  
2 speculate.

3 THE COURT: Sustained.

4 BY MR. PEDIGO:

5 Q Do you have any reason to suspect that they  
6 wouldn't have submitted that application after getting your  
7 signature?

8 MR. McVEIGH: Same objection.

9 THE COURT: I'll overrule that.

10 THE WITNESS: You'd have to ask them why they  
11 didn't submit it.

12 BY MR. PEDIGO:

13 Q My question is, do you have any reason to think  
14 why they would get your signature and then not turn around  
15 and submit the document, if in fact they needed it, and this  
16 happened in 1993.

17 A No.

18 Q You recall the signature on June 18, 1996, and  
19 that is at document -- we have so many copies. Let me try  
20 to get you the best one.

21 THE COURT: You're talking about the June 22nd?

22 MR. PEDIGO: No, Your Honor. I want to ask her  
23 about June 18, 1996.

24 That's Exhibit 49, Ms. Sumpter.

25 BY MR. PEDIGO:

1 Q And specifically if you could take a look at page  
2 three of Exhibit 49.

3 (Pause)

4 Q Do you have that, Ms. Sumpter?

5 A Yes.

6 Q It's your testimony you did not sign the signature  
7 on Exhibit 49, page three, is that correct?

8 A That's correct.

9 Q Compare that to Exhibit 19, page 216, if you would  
10 please.

11 Have you had a chance to compare those signatures?

12 A Sure.

13 Q In your opinion, does it appear that the person  
14 signing one of those documents attempted to approximate your  
15 signature?

16 A You mean copy my signature?

17 Q Yes.

18 A They did a very good job if they tried.

19 (Laughter)

20 Q Let me ask you this. Is it your position on page  
21 216 that somebody was attempting to replicate your  
22 signature?

23 A It looks like they were trying to replicate it on  
24 that one, yes.

25 Q When you say on that one, that's because you're

1 comparing it to page three of Exhibit 49 where it doesn't  
2 look like anybody tried to do that.

3 A I know my signature.

4 Q I'm sorry, let me ask that again.

5 So when you compare it on page 216, that signature  
6 to the signature on page three of Exhibit 49, as I  
7 understand your opinion you're telling us that it looked  
8 like someone attempted to replicate your signature on page  
9 216, the signature of June 22nd, and no attempt along those  
10 lines was made on the June 18th signature. Is that correct?

11 MS. LANCASTER: Your Honor, the signatures speak  
12 for themselves.

13 THE COURT: The witness is entitled to be asked  
14 what she thinks about this. It's her signature, or purports  
15 to be her signature. She ought to have an opportunity to  
16 answer.

17 BY MR. PEDIGO:

18 Q Ms. Sumpter, do you remember my question?

19 A I understand this one looks like somebody tried to  
20 copy it, this one doesn't look like --

21 Q I'm asking you if that's the sum total of your  
22 testimony when you look at these two signatures of your  
23 name.

24 A It appears that way, yes.

25 Q You didn't hesitate talking about your signature a

1 little earlier. Do you have a hesitation now?

2 MS. LANCASTER: Objection, Your Honor. Is that a  
3 question?

4 THE COURT: That's not a question.

5 BY MR. PEDIGO:

6 Q Do you have a question now, after having a chance  
7 to further look at these signatures, that maybe you did sign  
8 the June 22nd document?

9 A No. I did not sign it, either of them.

10 Q Let me ask you to turn to Exhibit 53, please.

11 (Pause)

12 Q Are you there, Ms. Sumpter?

13 A Yes.

14 Q Did you -- Is this the document you were referring  
15 to as the request to your uncle to transfer your name off  
16 that license or put the license in his name? Is that  
17 correct?

18 A Correct.

19 Q You're not aware of any other document along those  
20 lines, are you?

21 A No.

22 Q I'd like to ask you, the previous Exhibit 52 at  
23 page 10. This is the transfer document you testified about.

24 (Pause)

25 Q Are you looking at that?

1 A Yes, sir.

2 Q You did tell us that was your signature, correct?

3 A That is my signature.

4 Q As a result of this assignment of authorization,  
5 again, you meant to transfer your license to Ron and Pat,  
6 but in this case can you take a look at specifically who was  
7 going to be the transferee? It's in the certification  
8 block there. Do you see that?

9 A Yes, sir.

10 Q Who specifically did you attempt to transfer this  
11 license to?

12 A DLB.

13 Q DLB Enterprises d/b/a/ Metroplex Two Way Radio?

14 A I understood it to be their company, yes.

15 Q And that was on January 28, 1998, is that correct?

16 A Yes.

17 Q At that time you were aware of the Net Wave  
18 petition, is that correct?

19 A Yes.

20 Q And notwithstanding the allegations made in that,  
21 you still took the position that it would be appropriate for  
22 your license to be transferred to DLB Enterprises, is that  
23 correct?

24 A Yes.

25 Q Is that your position today? You wouldn't have a

1 problem if DLB Enterprises operated your license or your  
2 station?

3 A It's fine with me. I just want my name off of it.

4 Q That's fine with you?

5 A Yes.

6 Q And you are aware Diane and Dave are the  
7 principal, day to day operators of DLB Enterprises, or are  
8 you aware of that?

9 A Yes.

10 Q So you understand that if this transfer was  
11 approved by the FCC then your license could be owned by DLB  
12 Enterprises and operated by your cousin Dave and Diane. You  
13 understand that, don't you?

14 A Yes.

15 Q And does that change your answer about what you  
16 would like to see happen to your license?

17 MS. LANCASTER: Objection, Your Honor. That's  
18 irrelevant, what she would like to see happen to her  
19 license. It has absolutely nothing to do with the issues  
20 before the Court.

21 THE COURT: Let me ask this. Do you care what  
22 happens to your license?

23 THE WITNESS: As long as my name's taken off --

24 THE COURT: You don't care if somebody takes your  
25 name off and throws it in the trash, that would be okay with

1     you?

2                 THE WITNESS: That would be fine with me.

3                 THE COURT: Or if somebody takes your name off and  
4     puts my name on there, you wouldn't care?

5                 THE WITNESS: As long as my name is taken off.

6                 THE COURT: So if --

7                 THE WITNESS: That's why we signed these.

8                 THE COURT: If it went to David and Diane you  
9     wouldn't care.

10                THE WITNESS: No.

11                THE COURT: If it went to Ron and Pat would you  
12     care?

13                THE WITNESS: No.

14                BY MR. PEDIGO:

15                Q     Is that because you have a positive opinion of  
16     Dave and Diane and their ethics, running a business and  
17     everything?

18                MR. McVEIGH: Objection. There's no foundation as  
19     to what the familiarity of the witness is with her cousin's  
20     business practices.

21                THE COURT: Sustained.

22                MR. PEDIGO: Your Honor, I'm about through. Just  
23     let me double check.

24                (Pause)

25                BY MR. PEDIGO:

1 Q Let me ask you, Ms. Sumpter, you were asked some  
2 questions about your knowledge of the construction of your  
3 station. Do you recall that line of questioning?

4 A Yes.

5 Q Do you have any appreciation for what it takes to  
6 construct a station or whether a station is constructed or  
7 not?

8 MS. LANCASTER: Objection. Compound.

9 THE COURT: Do you want to rephrase it?

10 MR. PEDIGO: I'll rephrase it.

11 BY MR. PEDIGO:

12 Q When you answered Ms. Lancaster's question that  
13 you didn't think the station was constructed, do you know  
14 what it takes to construct a station?

15 A No, I do not.

16 Q So if it were as simple as programming a piece of  
17 radio gear, would you know that is all it takes either way  
18 to construct a station?

19 MS. LANCASTER: Your Honor, objection. Assumes  
20 testimony not in evidence. That's not all it takes.

21 THE COURT: Well, I think the answer was that the  
22 witness doesn't know.

23 THE WITNESS: I don't know.

24 THE COURT: By telling her, it's not going to make  
25 her, or by suggesting what it would take to construct,

1 that's not going to make her know.

2 MR. PEDIGO: I just wanted to make sure the  
3 Government wasn't trying to offer her as someone with  
4 particular expertise in the construction of radio stations.

5 THE COURT: If they were trying to, they wouldn't  
6 have succeeded.

7 (Laughter)

8 MR. PEDIGO: Okay.

9 BY MR. PEDIGO:

10 Q You said you haven't talked to your mother,  
11 whether she signed your name on either June 18th or June  
12 22nd, is that correct?

13 A Have I talked to her?

14 Q Whether she did that.

15 THE COURT: We're talking about page 216 of  
16 Exhibit 19 and the one you have on your left which is page  
17 10 of Exhibit 52, whether your mother signed your name on  
18 these. Isn't that what you were talking about?

19 MR. PEDIGO: Yes.

20 MS. LANCASTER: Your Honor, I don't believe he was  
21 talking about page 10 of Exhibit 52.

22 MR. PEDIGO: Oh --

23 THE COURT: You're right, you're right.

24 MR. PEDIGO: The June application, Your Honor.

25 THE COURT: I had the wrong person being right.

1 THE WITNESS: Did I ask her if she signed those?

2 BY MR. PEDIGO:

3 Q My question to you is, did you ever ask your  
4 mother point blank, if she signed your name?

5 A No.

6 Q Did you ever ask your mother if she had  
7 discussions with Ron and Pat about using your name and just  
8 neglected to tell you?

9 A No.

10 Q And the no response is that you never asked your  
11 mother that, is that correct?

12 A I never asked my mother that.

13 Q So as you sit here today, that conversation could  
14 have taken place between your mom and you have no knowledge  
15 either way, is that true?

16 MR. McVEIGH: Objection. He's asking the witness  
17 to speculate.

18 THE COURT: State it again, because I kind of  
19 missed the beginning of it.

20 BY MR. PEDIGO:

21 Q Ms. Sumpter, as you sit here today, your mother  
22 Norma and her sister Pat had a discussion about using your  
23 name in the application process -- Could that have taken  
24 place without your knowledge?

25 MR. McVEIGH: Objection. Asking the witness to

1 speculate. The witness can only testify as to what she has  
2 personal knowledge of.

3 MS. LANCASTER: And also Your Honor, it assumes  
4 facts not --

5 MR. McVEIGH: And the predicate of the question is  
6 that she wasn't party to the conversation.

7 MS. LANCASTER: And it assumes facts not in  
8 evidence.

9 THE COURT: This is Cross-Examination, he can  
10 assume whatever he wants to. But essentially the question  
11 is if Norma and Pat had a conversation about was it Norma  
12 signing your name, you don't know about it. That's not  
13 speculation and it's certainly within the realm of Cross-  
14 Examination.

15 Do you want to answer it? Do you remember it?  
16 Let me say it again.

17 THE WITNESS: Yes, please.

18 THE COURT: If Norma and Pat had discussions in  
19 the past about Norma signing your name, you don't know about  
20 it.

21 THE WITNESS: I don't know about it.

22 THE COURT: Is that your question?

23 MR. PEDIGO: Yes, Your Honor.

24 BY MR. PEDIGO:

25 Q And you're not taking the position that they did

1 have a discussion or they did not have a discussion, you're  
2 just telling us you don't know about that either way.

3 A I don't know.

4 Q One of the reasons is because you've never asked  
5 your mother if that took place, have you?

6 A No.

7 Q When you came home in November of 1997 and saw the  
8 Net Wave petition and were presented with the letter that  
9 your father wanted you to sign, how much discussion had  
10 taken place between your family --

11 MR. McVEIGH: Objection. That's calling on the  
12 witness to speculate.

13 THE COURT: Overruled.

14 THE WITNESS: I don't -- The only thing I recall  
15 is that we discussed that letter before my dad wrote it,  
16 that he was going to tell Uncle Ron that he wanted our names  
17 off of it. That's the only discussion between getting the  
18 Net Wave and that letter that I recall.

19 MR. PEDIGO: Let me be more precise. That's my  
20 fault.

21 BY MR. PEDIGO:

22 Q Did your dad ever tell you at that time if he had  
23 had prior discussions with either your mother or your sister  
24 on that very same topic?

25 A He didn't tell me.

1 Q He didn't tell you either way?

2 A No, I don't know.

3 Q So when you came home you were presented with the  
4 letter you were supposed to sign and that was really the end  
5 of it, isn't that correct?

6 A I had the Net Wave petition in front of me and the  
7 800 form in front of me because they came about the same  
8 time, from what I remember. I mean they were there, from  
9 what I remember they were there when I got home from school.

10 Q And they were there, and the people that lived at  
11 your house in Mesquite and your sister -- Was she in the  
12 local area at that time?

13 A Yes.

14 Q And they had already had a chance to discuss what  
15 the response would be, isn't that true?

16 MR. McVEIGH: Objection. Calling on the witness  
17 to speculate.

18 THE COURT: If she knows.

19 THE WITNESS: I don't know. I don't know if they  
20 discussed it. I don't know.

21 BY MR. PEDIGO:

22 Q Didn't they have the opportunity to discuss what  
23 the response should be?

24 MR. McVEIGH: Objection. Calling on the witness  
25 to speculate.

1 THE COURT: Well, I mean everybody has the  
2 opportunity to do everything. You may have the opportunity  
3 to leave here.

4 (Laughter

5 MS. LANCASTER: Your Honor, but there's been no --

6 THE COURT: The objection is sustained.

7 I think we ought to --

8 MR. PEDIGO: Break for the day?

9 THE COURT: Well, we'll break when you finish.  
10 And if Ms. Lancaster has virtually nothing, we'll continue.

11 MS. LANCASTER: I have very few questions, Your  
12 Honor.

13 THE COURT: Because I'm frankly, losing my  
14 concentration a little bit. It's been a long day.

15 BY MR. PEDIGO:

16 Q Did your mother ever tell you who signed either  
17 the June 18th or the June 22nd application?

18 A No.

19 Q Did your father ever tell you who did?

20 A No.

21 Q Did you understand if you had a recollection, and  
22 this is in November of 1997, that was different from what  
23 your father typed on that letter, that that would be adverse  
24 to the recollections of your other family members?

25 MS. LANCASTER: Objection.

1 MR. McVEIGH: Objection. I don't understand the  
2 question.

3 MS. LANCASTER: It assumes facts not in evidence,  
4 also.

5 THE COURT: This is Cross-Examination. But you  
6 might want to change the word adverse.

7 BY MR. PEDIGO:

8 Q You understood the position that your father  
9 wanted to take with regard to responding to Net Wave, is  
10 that correct?

11 A Yes.

12 Q And his position was he wanted to get the license  
13 out of his name, was that correct?

14 A Yes. We all wanted them out of our names.

15 Q Your father. Let's just stay with him, okay?

16 A Okay.

17 Q Is that fair?

18 A Sure.

19 Q You understood he took the position that he didn't  
20 sign one of the four Sumpter applications in June of 1996.  
21 You understood that was your father's position, correct?

22 A Yes.

23 Q Did you also understand that that was your  
24 mother's position, that she did not sign her name to an FCC  
25 application in June of 1996, is that correct?

1 A Yes.

2 Q And she participated in discussions where you,  
3 your sister and your father all took the position that they  
4 didn't know who signed the June 18th application, is that  
5 correct?

6 MR. McVEIGH: Objection. The question is vague.  
7 I don't know who she is, who participated in discussions.

8 THE COURT: There are only three Sumpters left.

9 MS. LANCASTER: But there are three she's, Your  
10 Honor.

11 MR. McVEIGH: Three she's.

12 THE COURT: Just restate.

13 BY MR. PEDIGO:

14 Q Did you understand participating in those  
15 discussions with your family in November of 1997 that the  
16 four Sumpters were going to take the position that they did  
17 not authorize the use of their names in June of 1996. Did  
18 you understand that to be the case?

19 A Yes.

20 Q Did you then understand if you took a different  
21 position or had a different recollection about when you  
22 signed that FCC application you would be saying a fact  
23 different from your family members. Did you understand  
24 that?

25 MR. McVEIGH: Objection. Calling on the witness